

October 31, 2018

Director
Air and Toxics Technical Enforcement Program
Office of Enforcement, Compliance, and Environmental Justice
Environmental Protection Agency Region 8
Mail Stop: 8ENF-AT300
1595 Wyncoop Street
Denver, Colorado 80202-1129

RECEIVED

NOV 1 - 2018

Office of Enforcement, Compliance and Environmental Justice

RE: NSPS OOOOa 2018 Report for Confluence DJ, LLC

Ladies/Gentlemen:

Olsson, on behalf of Confluence DJ, LLC (Confluence), is submitting the New Source Performance Standards (NSPS) OOOOa report for the assets located in the Denver-Julesburg (DJ) Basin in Colorado as required by 40 CFR 60.5420a(b). This report represents the period from August 2, 2017 through August 1, 2018.

The annual report covers the following affected facilities:

- Well affected
- Fugitive Components

The specific facility site names are located within the submittal accompanying this cover letter.

Should you have any technical questions or need additional information feel free to contact me at avoit@olsson.com or Mike Dickinson at mDickinson@confluencelp.com.

Sincerely,



Amy Voit Olsson

ATTACHMENT A

Certification

§60.5420a(b)(1)(iv)

A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

CERTIFICATION BY A CERTIFYING OFFICIAL OF TRUTH, ACCURACY AND COMPLETENESS

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

SIGNED:

Name of Certifying Official: Mike Dickinson

Title of Certifying Official: Senior Vice President Operations

Email Address: mdickinson@confluencelp.com

Phone Number: 303-226-9517

ATTACHMENT B

Site Information

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report For each affected facility, an owner or operator must include the information specified in paragraphs (b)(1)(i) through (iv) of this section in all annual reports:

				SITE INFORMATION							ALTERNATIVE ADDRESS INFO	RMATION (IF NO PHYSICAL ADDRI	ESS AVAILABLE FOR SITE *)	REPORTING	INFORMATION	PE Certification	ADDITIONA	AL INFORMATION
(Field value will automatically enerate if a value is not entered.)	Company Name * (§60.5420a(b)(1)(i))	Facility Site Name * (§60.5420a(b)(1)(i))	US Well ID or US Well ID Associated with the Affected Facility, if applicable. * (§60.5420a(b)(1)(i))	Address of Affected Facility * (§60.5420a(b)(1)(i))	Address 2	City *	County *	State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Description of Site Location (§60.5420a(b)(1)(i))	Latitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (§60.5420a(b)(1)(i))	Longitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (§60.5420a(b)(1)(i))	Beginning Date of Reporting Period.* (§60.5420a(b)(1)(iii))	Ending Date of Reporting Period.* (\$60.5420a(b)(1)(iii))	Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. * (§60.5420a(b)(12)) Please provide only one file per record.		Enter associated f name reference
	e.g.: ABC Company	e.g.: XYZ Compressor Station	e.g.: 12-345-67890-12	e.g.: 123 Main Street	e.g.: Suite 100	e.g.: Brooklyn	e.g.: Kings Count	ye.g.: NY	e.g.: 11221		e.g.: 7 miles NE of the intersection of Hwy 123 and Hwy 456	e.g.: 34.12345	e.g.: -101.12345	e.g.: 01/01/2016	e.g.: 06/30/2016	e.g.: Certification.pdf or XYZCompressorStation.pdf		e.g.: addlinfo.zip or XYZCompressorStati .pdf
	Confluence DJ, LLC	Flaherty 18-I	05-123-42434	NA		NA.	Weld	CO	NA			(b) (e)		8/2/201	7 8/1/2018			
	Confluence DJ, LLC	Flaherty 18-I	05-123-42435	NA		NA	Weld	CO	NA					8/2/201	7 8/1/2018	le control of the con		
	Confluence DJ, LLC	Flaherty 18-I	05-123-43578	NA		NA	Weld	CO	NA					8/2/201	7 8/1/2018			
	Confluence DJ, LLC	Freedom 33	05-123-45542	NA		NA	Weld	CO	NA					8/2/201	7 8/1/2018			
	Confluence DJ, LLC	Freedom 33	05-123-45544	NA.		NA	Weld	CO	NA					8/2/201				
	Confluence DJ, LLC	Long 22-B	05-123-41513	NA		NA	Weld	CO	NA					8/2/201	7 8/1/2018			
	Confluence DJ, LLC	State Seventy Holes J-1	05-123-41614	NA		NA	Weld	CO	NA					8/2/201	7 8/1/2018			

ATTACHMENT C

Well Affected Facilities

40 CFR Part 90 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420e(b) Annual Report For each well affected facility, an owner or operator must include the information specified in paragraphs (b)(2)(i) through (iii) of this section in all annual reports:

Marie San Company of the Company of	THE RESERVE AND ADDRESS OF THE PARTY OF THE	ACCRECATE VALUE OF THE PARTY OF	THE RESERVE AND PARTY OF THE PA	THE RESERVE OF THE PARTY OF
The interior (*) no	of to each field in	dicates that the	corresponding 6	eld is required.

		that the corresponding field is required.	560.5432a Low Pressure Wells	All Well Completions							Well Affected F	acilities Required to Comply v	with \$60.5375a(a) and \$60.5	375a(f)				
(Salect from dropdown list- any need to scroll as	United States Well Number* (§60.5420a(b)(1)(ii))	Records of deviations where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in § 60.5375a. * (\$60.5420a(b)(2)(ii) and §60.5420a(c)(1)(ii))	Please provide the file name that contains the Record of Determination and Supporting Inputs and Calculations * (\$60.5420a(c)(1)(viii)) Please provide only one file per record.	Well Completion ID * (§60.5420a(c)(1)(i))	Well Location * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))	Date of Onset of Flow Following Hydrauli Fracturing or Refracts (\$60.5420a(b)(2)(i) a \$60.5420a(c)(1)(iii)(A)	Following Hydraulic Fracturing or Refracturi and (\$60.5420a(b)(2)(i) an	Direct flowback to a Separator * (460 5420a(b)(2)(i) and	Time of Each Attempt to Direct Flowback to a Separator * (\$50.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(8)	Date of Each Occurrence of Returning to the Initial Flowback Stage * (\$60.5420e(b)(2)(i) and \$60.5420e(c)(1)(iii)(A)-(B)		Date Well Shut In and Flowback Equipment Permanently Disconnected or the Starfup of Production (\$60.5420e(b)(2)(i) and \$60.5420e(c)(1)(iii)(A)-(8))	Time Well Shut In and Flowback Equipment Permanently Disconnected or the Startup of Production * (60.5420w(b)(2)(i) and \$60.5420w(c)(1)(ii)(A)-(B))	Duration of Flowback in Hours * (§60.5420*(b)(2)(f) and §60.5420*(c)(1)(iii)(A)-(6)	Duration of Recovery in Hours (Not Required for Weils Complying with \$60.5375a(f) (\$60.5420a(c)(1)(iii)(A))	Disposition of Recovery * (660.5420a(b)(2)(f) and \$60.5420a(c)(1)(iii)(A)-(8)(Duration of Combustion is Hours* (560.5420a(b)(2)(i) and 660.5420a(c)(1)(iii)(A)-(B)	in Duration of Venting in Hours * [\$60.5420a(b)(2)(i) and 0)] \$60.5420a(c)(1)(ii)(A)-(8))
	e.g.: 12-345-67890-12	e.g.: On October 12, 2016, a separator was not onsite for the first 3 hours of the flowback period	e.g.: lowpressure.pdf or XYZCompressorStation.pdf	e.g.: Completion ABC	e.g.: 34.12345 latitude, -101.12345 longitude	e.g.: 10/16/16	e.g. 10 a.m.	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 10/16/16	eg.: 10 a.m.	eg:5	44/5	e.g.: Used as onsite fuel	eg:5	44:5
		Buford 33-10-4L Buford 33-9-3L	NA NA	Buford 33-10-4L Buford 33-9-3L	(b) (9)	1/9/		45 1/13/201 30 1/18/201	12:0 14:0		NA.	2/28/2018 3/1/2018	14:30 14:40	1200		7 Sales 9 Sales		

			Exceptions	Under §60.5375a(a)(3) - Tec	hnically infeasible to Route to the Gas Flow Line or Co	ellection System, Re-Inject int	to a Well, Use as an Onsite Fuel So	surce, or Use for Another Usefu	Purpose Served By a Purchase	d Fuel or Raw Material						Well Affected Facilit	ties Meeting the Criteria of \$60.5
Reason for Venting in lieu of Capture or Combustion * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(ii)(A)-(B))	Well Location * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(3)(iv/j)	Specific Exception Claimed (860.5420a(b)(2)(i) and 960.5420a(c)(1)(iv))	Starting Date for the Period the Well Operated Under the Exception * (\$60.5420a(c)(1)(iv)) \$60.5420a(c)(1)(iv))	Ending Date for the Period the Well Operated Under the Exception * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iv.))	Why the Well Meets the Claimed Exception * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iv))	Name of Nearest Gathering Line * (960.5420a(s)(2)(i) and 860.5420a(c)(1)(iii)(A)-(8))	Location of Nearest Gathering Line * (\$60.5420e(b)(2)(i) and \$60.5420e(c)(1)(iii)(A)-(Bi)	Technical Considerations. Preventing Routing to this Line (860.5420a(b)(2)(i) and (60.5420a(c)(1)(iii)(A)-(b))	Cepture, Rainjection, and Reuse Technologies Considered * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))	Aspects of Gas or Equipment Preventing Use of Recovered Gas as a Fuel Crisite * (560.5420e(b)(2)(i) and 560.5420a(c)(1)(ii)(A)-(B))	Technical Considerations Preventing Use of Recovered Gas for Other Useful Purpose * (\$60.5420e(b)(2)(i) and \$60.5420e(c)(1)(ii)(A)-(6))	Additional Ressons for Technical Infessibility * (\$60.5420a(b)(2)(ii) and \$60.5420a(c)(1)(iii)(A)-(B))	Well Location* (\$46.5420a(b)(2)(i) and §60.5420a(c)(3)(iii)(A) and (C))	Date of Onset of Flowback Following Hydraulic Fracturing or Refracturing (\$60.5420e(b)(2)(i) and \$60.5420e(c)(1)(ii)(A) and (CI)	Time of Onset of Flowback Following Hydraulic Fracturing or Refracturing (\$60.5420e(b)(2)(i) and \$60.5420e(c)(13)(iii)(A) and (Ci)	Date Well Shut in and Flowback Equipment Permanently Disconnected or the Startup of Production " (§66.5420a(b)(2)(ii) and §60.5420a(c)(3)(iii)(A) and {C}	Time Well Shut in and Flowback Equipment Permanently Disconnected or the Startup of Production * (860.5420a(b)(2)(i)) and \$60.5420a(c)(1)(iii)(A) and (C))
e.g: No onsite storage or combustion unit was available at the time of completion.	e.g.: 34,12345 latitude, -101.12345 longitude	e.g.: Technical infeasibility under 60.5375a(a)(3)	*4: 10/16/2016	*#:10/18/2016	e.g.: As further described in this report, technical issues prevented the use of the gas for useful purposes.		e g : 100 miles away at 34 12345 latitude, -101 12345 longitude	e.g. right of use	e.g.: on-site generators	e.g.: gas quality	e.g. gas quality	e.g. well damage or clean-up	e.g.: 14.12345 latitude, -101.12345 langitude	e.g.: 10/16/16.	eg:10 a.m.	es: 10/16/16	eg:10 a.m.
NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA

375e(e)(1)(H)(A) - Not Hyd	draulically Fractured/Rel	fractured with Liquids or	Do Not Generate Condensate, Intermedia	ate Hydrocarbon Liquids, or	r Produced Water (No Liqui	id Collection System or Sep	erator Onsite)			Well Affected Facilities Required to Comply with Both \$60.5375a(a)(1) and (3) Using a Digital Photo in lieu of Records Required by \$60.5420a(c)(1)(i) through (br)	Well Affected Facilitie	es Meeting the Criteria of \$60.5375a(g) -	300 scf of Gas per Stock Tank Barrel of Oil Produced
Duration of Flowback in Hours * (§60.5420a(b)(2)(i) and §60.5420a(c)(3)(H)(A) and (C))	Duration of Combustion in Hours * (960.5420a(b)(2)(i) and 560.5420a(c)(3)(ii)(A) and (C))	In an or other Parket State of	Reason for Venting in Neu of Capture or Combustion *	Does well still meet the conditions of \$60.5375e(1)(iii)(A)? * (660.5420a(b)(2)0) and \$60.5420a(c)(1)(iii)(C)(2))	If applicable Date Well Completion Operation Stopped * ((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2))	If applicable: Time Well Completion Operation Stopped * ((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2 i)		If applicable: Time Separator Installed ((\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(ii)(C)(2)(ii)	Are there liquids collection at the well site? Based on information and belief furmed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. ((560.5420e(b)(2)(i) and \$60.5420a(c)(1)(iii)(C)(3)(iii)(C)(3)(iii)(C)(3)(iii)(C)(3)(iii)(C)(3)(iiii)(C)(4)(iiii)(C)(4)(iii)(C)(4)(iiii)(C)(4)(iiii)(C)(4)(iiii)(C)(4)(iiii)(C)(4)(iiiii)(C)(4)(iiiiiiiiii	Please provide the file name that contains the Digital Photograph with Date Taken and Latitude and Longitude Imbedded (or with Visible GPS). Showing Required. Equipment. (960-5420a(b)(2)) and 960-5420a(c)(1)(V)) Please provide only one file per record.	Well Location* (\$40.5420a(b)(2)(i) and \$60.5420a(c)(1)(vi)(8i)	Please provide the file name that contains the flecord of Analysis Performed to Claim Well Meets \$60.5375a(g), Including GOR Values for Istabilished Leases and Data from Wells in the Same Rasin and Field: (860.5420a(c)(1)(vi)(A)) Please provide only one file per record.	Does the well meet the requirements of \$60,5375a[g]? Bissed on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. * [160.5420a[b](2)(i) and \$60.5420a[c](1)(vi)(C))
eg:5	eg:5	4615	e.g. No onsite storage or combustion unit was available at the time of completion	e.g.: Yes	e.g.: 10/16/16	eg:20am.	eg::10/16/16	e.g.: 10 a.m.	e.g.: No			e.g.: GORcalics.pdf or XYZCompressorStation.pdf	e.g.: Yes
NA NA	NA. NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA

ATTACHMENT D

Fugitive Emissions

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report

For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, an owner or operator must include the records of each monitoring survey including the

The asterisk (*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up)	Identification of Each Affected Facility * (§60.5420a(b)(1))	Date of Survey * (§60.5420a(b)(7)(i))	Survey Begin Time * (§60.5420a(b)(7)(ii))		Name of Surveyor * (§60.5420a(b)(7)(iii))	During Survey *	Sky Conditions During Survey * (§60.5420a(b)(7)(iv))	During Survey *	CONTRACTOR OF THE PARTY OF THE	Deviations From Monitoring Plan (If none, state none.) * (§60.5420a(b)(7)(vi))
	e.g.: Well Site ABC	e.g.: 8/13/17	e.g.: 10:00 am	e.g.: 1:00 pm	e.g.: John Smith	e.g.: 90°F	e.g.: Sunny, no clouds	e.g.: 2 mph	e.g.: Company ABC optical gas imaging camera	e.g.: None
	Flaherty 18-I	10/12/2017	8:00	8:45	AV	57 F	Cloudy	8 mph	FLIR GF300 Series	None
	Long 22-B	10/12/2017	12:00	13:15	AV	63 F	Cloudy	10 mph	FLIR GF300 Series	None
	Flaherty 18-I	2/15/2018	8:30	9:30	MM	35 F	Partly Cloudy	15 mph	FLIR GF300 Series	None
	Long 22-B	2/15/2018	10:45	11:15	MM	46 F	Partly Cloudy	5 mph	FLIR GF300 Series	None
	Freedom 33	4/19/2018	10:45	11:15	AV	55 F	Cloudy	14 mph	FLIR GF300 Series	None
	State Seventy Holes J-	6/14/2018	8:15	8:30	AV	66 F	Partly Cloudy	5 mph	FLIR GF300 Series	None

Type of Component for which Fugitive Emissions Detected * (§60.5420a(b)(7)(vii))	Number of Each Component Type for which Fugitive Emissions Detected * (§60.5420a(b)(7)(vii))	Type of Component Not Repaired as Required in §60.5397a(h) * (§60.5420a(b)(7)(viii))	Number of Each Component Type Not Repaired as Required in § 60.5397a(h) * (§60.5420a(b)(7)(viii))	Type of Difficult-to- Monitor Components Monitored * (§60.5420a(b)(7)(ix))	Number of Each Difficult- to-Monitor Component Type Monitored * (§60.5420a(b)(7)(ix))	Type of Unsafe-to-Monitor Component Monitored * (§60.5420a(b)(7)(ix))	Number of Each Unsafe-to Monitor Component Type Monitored * (§60.5420a(b)(7)(ix))		s Component
e.g.: Valve	e.g.: 3	e.g.: Valve	e.g.: 1	e.g.: Valve	e.g.: 1	e.g.:Valve	e.g.: 1	e.g.: 11/10/16	
None	0	None	0	None	0	None	0	None	
Valve	1	None	0	None	0	None	0)	10/19/2017
Thief Hatch	1	None	0	None	0	None	0)	2/16/2018
None	0	None	0	None	0	None	0	None	
None	0	None	0	None	0	None	0	None	
None	0	None	0	None	0	None	0	None	

				OGI	Compressor Station Affected Facility Only			
Type of Component Placed on Delay of Repair * (§60.5420a(b)(7)(xi))	Number of Each Component Type Placed on Delay of Repair * (§60.5420a(b)(7)(xi))	Explanation for Delay of Repair * (§60.5420a(b)(7)(xi))	Type of Instrument Used to Resurvey Repaired Components Not Repaired During Original Survey * (§60.5420a(b)(7)(xii))	Training and Experience of Surveyor * (§60.5420a(b)(7)(iii))	Was a monitoring survey waived under § 60.5397a(g)(5)? * (§60.5420a(b)(7))	If a monitoring survey was waived, the calendar months that make up the quarterly monitoring period for which the monitoring survey was waived. * (§60.5420a(b)(7))		
e.g.: Valve	e.g.: 1	e.g.: Unsafe to repair until next shutdown	e.g.: Company ABC optical gas imaging camera	e.g.: Trained thermographer; completed 40-hour course at XYZ Training Center. Has 10 years of experience with OGI surveys.	e.g.: Yes	e.g.: January; February; and March		
None	(0 None	None	OGI certified w/ ITC, 3+ years experience w/ OGI	NA	NA		
None		0 None	FLIR GF300 Series	OGI certified w/ ITC, 3+ years expereience w/ OGI	NA	NA		
None		0 None	FLIR GF300 Series	OGI certified w/ ITC, 4+ years expereience w/ OGI	NA	NA		
None		0 None	None	OGI certified w/ ITC, 4+ years expereience w/ OGI	NA	NA		
None		0 None	None	OGI certified w/ ITC, 3+ years expereience w/ OGI	NA	NA		
None		0 None	None	OGI certified w/ ITC, 3+ years expereience w/ OGI	NA	NA		

Fugitive Component Surveyors

OGI Surveyor*		
(§60.5420a(b)(7)(iii))	Training and Experience of Surveyor * (§60.5420a(b)(7)(iii))	OGI Certified?
AV	3+ years OGI experience, 4 years air quality compliance experience	Υ
MM	4+ years OGI experience, 10 years air quality compliance experience	Υ